



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 3 2003

The Honorable Edward G. Rendell
Governor of Pennsylvania
225 Main Capitol Building
Harrisburg, Pennsylvania 17120

Dear Governor Rendell:

Thank you for making recommendations on 8-hour ozone air quality designations. Your letter is an important step in providing the citizens of Pennsylvania with information on air pollution levels where they live and work. Levels of ground-level ozone, a major constituent of smog, have improved significantly since the Clean Air Act (CAA) was amended in 1990, at which time 135 areas were designated as not attaining the 1-hour ozone standard. Since that time nearly half those areas (67) have cleaned up their air to meet the 1-hour ozone standard and have been redesignated as attaining that standard. However, many areas still have not met the less stringent 1-hour ozone standard and, in 1997, the United States Environmental Protection Agency (EPA) promulgated a more stringent 8-hour ozone national ambient air quality standard. Thus, much work remains to be done. Under the CAA, EPA is required to promulgate designations for new or revised standards, such as the 8-hour ozone standard. Earlier this year, after several public interest groups filed a lawsuit claiming EPA had not met the statutory deadline for designating areas for the 8-hour ozone standard, we entered into a consent decree that requires us to promulgate designations by April 15, 2004.

We have reviewed your letter dated August 15, 2003 submitting Pennsylvania's recommendations on air quality designations for the 8-hour ozone standard. Consistent with section 107(d)(1) of the CAA, this letter is to inform you that, based upon the information contained in your letter, and in the absence of additional substantiation for your recommendations, EPA intends to make modifications to Pennsylvania's recommended designations and boundaries. If you would like to provide additional information about the areas in question, please provide this information by February 6, 2004, so that we can continue to work with your office as we move forward to make final designations. To advance the designation and classification process, please submit by December 30, 2003 your final 2003 monitoring data into the Air Quality System and, in addition, submit it by the above date to Judith M. Katz, Director, Air Protection Division, by official letter so that we can place it in the docket for the designations rulemaking.

The CAA defines a nonattainment area as any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant. EPA guidance indicates that Pennsylvania should use the larger of the Consolidated Metropolitan Statistical Area, Metropolitan Statistical Area, or the 1-hour ozone nonattainment area as the presumptive boundary for 8-hour ozone nonattainment areas. The guidance provides criteria factors that Pennsylvania should consider in

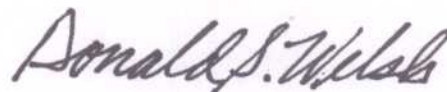
determining whether to modify the presumptive boundaries. We have reviewed your supporting information to either expand or contract the presumptive nonattainment area.

In addition to updating the other supporting data for the relevant factors (e.g., 1999 emissions inventory, 2002 census data), EPA has been tracking 2003 ozone monitoring data and their impact on areas' preliminary 2001-2003 design values. Where the updated information, including the preliminary 2001-2003 ozone monitoring data, indicate that an area's attainment status will differ from Pennsylvania's recommendation based on earlier data, including 2000-2002 monitoring data, EPA indicates the potential modification to the designation recommendation in the enclosure. Additionally, the EPA will continue to quality-assure all the relevant data to determine if it might affect the State's recommended designations. It is important for Pennsylvania to expedite submittal of 2003 ozone air quality data because it, along with the other data for the relevant factors, is critical to the designation and classification process.

The enclosure to this letter provides a table in which EPA identifies the Pennsylvania counties that are being identified as nonattainment. We are also providing a written summary of our reasoning for modifying your recommendations, explaining why we believe that our modifications are consistent with the statutory definition of a nonattainment area in light of the relevant factors provided in our guidance.

We look forward to a continued dialogue with Pennsylvania as we work to finalize the designations for the 8-hour ozone standard. As you know, the job of improving ozone air quality is a difficult one and we appreciate your continued efforts to work with us toward this goal. We will review any supporting information that Pennsylvania wishes to submit to EPA by February 6, 2004 on these recommendations. If you have any questions, please do not hesitate to contact me or have your staff contact Judith M. Katz, Director, Air Protection Division, at 215-814-2654.

Sincerely,



Donald S. Welsh
Regional Administrator

Enclosures

cc (w/enclosure):

The Honorable Kathleen A. McGinty, Acting Secretary, PADEP
Nicholas DiPasquale, Deputy Secretary for Air, PADEP
Joyce Epps, Director of Air Quality, PADEP

Enclosure 1

The following table identifies the individual areas and counties comprising those areas within Pennsylvania that EPA intends to designate as nonattainment. Following the table is a description of areas where EPA intends to modify the Pennsylvania recommendation and the basis for such modification. EPA intends to designate as attainment/unclassifiable all counties not identified in the table below.

Area	Pennsylvania Recommended Nonattainment Counties	EPA Recommended Nonattainment Counties
Adams-York, PA	Adams County York County	Adams County York County
Allentown-Bethlehem, PA	Carbon County Lehigh County Northampton County	Carbon County Lehigh County Northampton County
Altoona, PA		Blair County
Clearfield, PA	Clearfield County	Clearfield County
Erie, PA	Erie County	Erie County
Franklin, PA	Franklin County	Franklin County
Greene, PA	Greene County	Greene County
Harrisburg-Lebanon-Carlisle, PA	Cumberland County Dauphin County Lebanon County Perry County	Cumberland County Dauphin County Lebanon County Perry County
Indiana, PA		Indiana County
Johnstown, PA	Cambria County	Cambria County
Lancaster, PA	Lancaster County	Lancaster County
Philadelphia, DE-MD-NJ-PA	Bucks County Chester County Delaware County Montgomery County Philadelphia County	Bucks County Chester County Delaware County Montgomery County Philadelphia County

Pittsburgh, PA	Allegheny County Armstrong County Beaver County Butler County Fayette County Washington County Westmoreland County	Allegheny County Armstrong County Beaver County Butler County Fayette County Washington County Westmoreland County
Reading, PA	Berks County	Berks County
Scranton-Wilkes-Barre, PA	Lackawanna County Luzerne County Wyoming County	Lackawanna County Luzerne County Wyoming County Monroe County
State College, PA	Centre County	Centre County
Tioga, PA		Tioga County
Youngstown-Warren-Sharon, OH-PA	Mercer County	Mercer County
Williamsport, PA		Lycoming County

Enclosure 2

EPA Nonattainment Areas in Pennsylvania

Altoona Area

Pennsylvania did not recommend Blair County to be part of the Altoona nonattainment area. EPA is modifying the Pennsylvania recommendation by designating Blair County as nonattainment. This county is the only county in the Altoona Metropolitan Statistical Area (MSA) and contains a violating ozone monitor.

Indiana County

Pennsylvania did not recommend Indiana County as a nonattainment area. EPA is modifying the Pennsylvania recommendation by designating Indiana County as nonattainment. Indiana County is a non-MSA county without an ozone monitor, but it is between two nonattainment areas with violating monitors.

Johnstown Area

Pennsylvania recommended Cambria County to be part of the Johnstown 8-hour ozone nonattainment area. EPA is not modifying the Pennsylvania recommendation for the Johnstown nonattainment area. The Johnstown MSA includes both Cambria and Somerset Counties, but EPA is only recommending Cambria County as nonattainment. Somerset County does not contain an ozone monitor and Cambria County contains an ozone monitor measuring nonattainment of the ozone standard. EPA's analysis supports the exclusion of Somerset County from the Johnstown ozone nonattainment area. Since all of Pennsylvania is in the Ozone Transport Region, Somerset and Cambria Counties have already applied New Source Review, Vehicle Emissions Inspection Program, Volatile Organic Compound (VOC) and Nitrogen Oxide Reasonable Available Control Technology (NOx RACT), and many other control programs. Somerset County does not contain any utilities and therefore has no utility Nitrogen Oxide (NOx) emissions. The majority of the population and emissions in the Johnstown MSA lie in Cambria County. Overall, Somerset's total VOC, total NOx emissions, and population are very low (e.g., Somerset's total NOx emissions are less than 0.05% of Cambria's NOx emissions).

Pennsylvania Portion of the Philadelphia Area

Pennsylvania recommended Bucks County, Chester County, Delaware County, Montgomery County, and Philadelphia County to be part of the Philadelphia nonattainment area. EPA is not modifying the Pennsylvania recommendation for its portion of the Philadelphia area, but it is modifying the Philadelphia nonattainment area. The Philadelphia nonattainment area consists of 5 counties in Pennsylvania, 5 counties in New Jersey, 3 counties in Delaware, and 1

county in Maryland. The Maryland portion of the Philadelphia nonattainment area consists of Cecil County. The Delaware portion includes New Castle County, Kent County and Sussex County. The Pennsylvania portion of the Philadelphia nonattainment area includes the following counties: Bucks County, Chester County, Delaware County, Montgomery County, and Philadelphia County. The New Jersey portion includes: Burlington County, Camden County, Gloucester County, Salem County, and Mercer County.

Scranton-Wilkes-Barre Area

Pennsylvania recommended Lackawanna, Luzerne and Wyoming Counties to be part of the Scranton-Wilkes-Barre nonattainment area. EPA is modifying the Pennsylvania recommendation by adding Monroe County to the Scranton-Wilkes-Barre nonattainment area. Monroe County is a non-MSA county without an ozone monitor, but it is part of the 1-hour Scranton-Wilkes-Barre nonattainment area. EPA's analysis of the relevant criteria indicates that it more resembles a nonattainment county than an attainment county. For example, its mobile emissions are more than 6,100 tons per year, its population is more like that of a metropolitan area (149,000 people in 2002) and its population growth rate is 3800 people per year.

Tioga Area

Pennsylvania did not recommend Tioga County as a nonattainment area. EPA is modifying the Pennsylvania recommendation by designating Tioga County as nonattainment. The Tioga nonattainment area consists of Tioga County. This county is not part of any MSA and contains a violating ozone monitor.

Youngstown-Warren-Sharon Area

Pennsylvania recommended Mercer County as part of the Youngstown-Warren-Sharon nonattainment area. EPA is not modifying the Pennsylvania recommendation. Mercer County is the only county in the Sharon, Pennsylvania MSA and it has a violating ozone monitor. EPA has agreed to combine Mercer County with the Youngstown-Warren, Ohio MSA. The Youngstown-Warren-Sharon nonattainment area consists of Trumbull County, Mahoning County and Columbiana County, Ohio and Mercer County, Pennsylvania.

Williamsport Area

Pennsylvania did not recommend Lycoming County as a nonattainment area. EPA is modifying the Pennsylvania recommendation by designating Lycoming County as nonattainment. Lycoming County is a single county MSA with a violating ozone monitor.